TETRA TECH

April 11, 2017

Mr. Paul Doherty
EPA On-Scene Coordinator
U.S. Environmental Protection Agency
11201 Renner Boulevard
Lenexa, Kansas 66219

Subject: **Pre-CERCLA Screening Checklist/Decision Form**
Hydrogen Chloride – MGP Site, Atchison, Kansas
U.S. EPA Region 7 START 4, Contract No. EP-S7-13-06, Task Order No. 0001.031
Task Monitor: Paul Doherty, EPA On-Scene Coordinator

Dear Mr. Doherty:

Tetra Tech, Inc. (Tetra Tech) is submitting the attached Pre-CERCLA Screening Checklist/Decision Form regarding the Hydrogen Chloride – MGP site in Atchison, Kansas. If you have any questions or comments, please contact the Project Manager at (816) 682-4089.

Sincerely,

Brandon Jones
START Project Manager

Ted Faile, PG, CHMM
START Program Manager

cc: Debra Dorsey, START Project Officer (cover letter only)

40533415

X9025.14.0001.031

415 Oak Street, Kansas City, MO 64106
Tel 816.412.1741 Fax 816.410.1748 www.tetratech.com

DRAFT – Attachment A: Pre-CERCLA Screening Checklist/Decision Form – DRAFT 01-03-2017

This form is used in conjunction with a site map and any additional information required by the EPA Region to document completion of a Pre-CERCLA Screening (PCS). The form includes a decision on whether a site should be added to the Superfund program's active site inventory for further investigation. Select from available dropdown values for fields marked with an asterisk *.

Region: 7 **State/Territory:** KS **Tribe:** _____ _____

Click here for the EPA Tribe Entity Mapping spreadsheet. **EPA ID No. (If Available)**

Site Name: Hydrogen Chloride - MGP

Other Site Name(s):

Site Location: 1300 Main Street
(Street)

2	Atchison	Atchison	KS	66002-0130
Congressional District	(City)	(County)	(State / Terr)	(Zip+4)

If no street address is available: _____ (Township-Range) _____ (Section)

Checklist Preparer:

Brandon Jones/Environmental Scientist	03/23/2017
(Name / Title)	(Date)
Tetra Tech, Inc./Superfund Technical Assessment and Response Team (START)	(816) 412-1741
(Organization)	(Phone)
415 Oak Street	bjones@seagullenvirotech.com
(Street)	(Email)

Kansas City	Jackson	MO	64106-1120
(City)	(County)	(State / Terr)	(Zip+4)

Site Contact Info/Mailing Address: MGP Ingredients, Inc.
1300 Main Street, Atchison, KS 66002

CERCLA 105d Petition for Preliminary Assessment? No **If Yes, Petition Date (mm/dd/yyyy):** _____

RCRA Subtitle C Site Status: Is site in RCRAInfo? Yes **If Yes, RCRAInfo Handler ID #:** KSD007128218

Ownership Type*: Private **Additional RCRAInfo ID #(s):** _____

Site Type*: Manufacturing/Processing/Maintenance **State ID #(s):** _____

Site Sub-Type*: Chemicals & allied products **Other ID #(s):** 110000445073 (EPA Registry ID)

Federal Facility? No **Federal Facility Owner*:** (Make selection)

Formerly Used Defense Site (FUDS)? No **Federal Facility Operator*:** (Make selection)

Federal Facility Docket? No **If Yes, FF Docket Listing Date (mm/dd/yyyy):** _____

Federal Facility Docket Reporting Mechanism*: (Make selection)

Native American Interest? No **If Yes, list Tribe:** _____

Additional Tribe (s): _____

Attachment A: Pre-CERCLA Screening Checklist/Decision Form

Site Description

Use this section to briefly describe site background and conditions if known or (easily) available, such as: operational history; physical setting and land use; site surface description, soils, geology and hydrogeology; source and waste characteristics; hazardous substances/contaminants of concern; historical releases, previous investigations and cleanup activities; previous regulatory actions, including permitting and enforcement actions; institutional controls; and community interest.

Insert text here:

MGP Ingredients, Inc. (MGP) has operated at the Atchison location since 1941 and employs about 200 people at two locations. MGP processes wheat flour into food ingredients; byproducts from this process are mixed with corn to make alcohol additives used in distilled beverages, food, and pharmaceuticals. Distilled alcohol products, including gin, bourbon, and rye whiskey, are also produced. In addition, the company makes plant-based polymers for petroleum-based plastic items, such as disposable cutlery. In February 2016, a release occurred when a tanker truck was offloading sulfuric acid at the MGP wastewater pre-treatment plant in downtown Atchison, Kansas; the hose from the truck was inadvertently connected to piping leading to a 6,500-gallon aboveground storage tank (AST) containing sodium hypochlorite. A chemical reaction resulted from mixing of these chemicals, discharging a large, thick, white plume of gaseous hydrogen chloride and/or chlorine from the sodium hypochlorite tank. The plume spread northwar

Geospatial Information

Latitude: + 39.558716 — Decimal Degree North (e.g., +38.859156)

Longitude: − 95.132491 — Decimal Degree West (e.g., -77.036783)

Provide 4 significant digits at a minimum, more if your collection method generates them.

Except for certain territories in the Pacific Ocean, all sites in U.S. states and territories are located within the northern and western hemispheres and will have a positive latitude sign and negative longitude sign. The coordinate signs should be changed as necessary for sites in the southern and/or eastern hemispheres.

Point Description: Select the option below that best represents the site point for future reference and to distinguish it from any nearby sites.

- ☐ Geocoded (address-matched) Site Address
- ☐ Site Entrance (approximate center of curb-cut)
- ☐ Approximate Center of Site
- ☒ Other Distinguishing Site Feature (briefly describe below):

AST containing sodium hypochlorite

Point Collection Method: Check the method used to collect the coordinates above and enter the date of collection.

- ☐ Online Map Interpolation
- ☐ GPS (handheld, smartphone, other device or technology with accuracy range < 25 meters)
- ☐ GPS Other (accuracy range is ≥ 25 meters or unspecified)
- ☐ Address Matching: Urban
- ☐ Address Matching: Rural
- ☒ Other Method: Google Earth

Collection Date (mm/dd/yyyy): 12/01/2016

POINT-SELECTION CONSIDERATIONS

- Often the best point is a feature associated with the environmental release or that identifies the site visually.
- Use the curb cut of the entrance to the site if there is a clear primary entrance and it is a good identifier for the overall location.
- The approximate center of the site (a guess at the centroid) is useful for large-area sites or where there are no appropriate distinguishing features.
- Use the geocoded address if that is the only or best option available, but if possible use something more representative for sites larger than 50 acres.

Attachment A: Pre-CERCLA Screening Checklist/Decision Form

Complete this checklist to help determine if a site should be added to the Superfund Active site inventory. See Section 3.6 of the PCS guidance for additional information.	YES	NO	Unknown
1. An initial search for the site in EPA's Superfund active, archive and non-site inventories should be performed prior to starting a PCS. Is this a new site that does not already exist in these site inventories?	☒	☐	☐
2. Is there evidence of an actual release or a potential to release?	☒	☐	☐
3. Are there possible targets that could be impacted by a release of contamination at the site?	☒	☐	☐
4. Is there documentation indicating that a target has been exposed to a hazardous substance released from the site?	☒	☐	☐
5. Is the release of a naturally occurring substance in its unaltered form, or is it altered solely through naturally occurring processes or phenomena, from a location where it is naturally found?	☐	☒	☐
6. Is the release from products which are part of the structure of, and result in exposure within, residential buildings or business or community structures?	☐	☒	☐
7. If there has been a release into a public or private drinking water supply, is it due to deterioration of the system through ordinary use?	☐	☒	☐
8. Are the hazardous substances possibly released at the site, or is the release itself, excluded from being addressed under CERCLA?	☐	☒	☐
9. Is the site being addressed under RCRA corrective action or by the Nuclear Regulatory Commission?	☐	☒	☐
10. Is another federal, state, tribe or local government environmental cleanup program other than site assessment actively involved with the site (e.g., state voluntary cleanup program)?	☐	☒	☐
11. Is there sufficient documentation or evidence that demonstrates there is no likelihood of a significant release that could cause adverse environmental or human health impacts?	☐	☒	☐
12. Are there other site-specific situations or factors that warrant further CERCLA remedial/integrated assessment or response?	☐	☒	☐

Attachment A: Pre-CERCLA Screening Checklist/Decision Form

Preparer's Recommendation: ☐ **Add** site to the Superfund active site inventory.

☒ **Do not add** site to the Superfund active site inventory.

Please explain recommendation below:

PCS Summary and Decision Rationale

Use this section to summarize PCS findings and support the decision to add or not add the site to the Superfund active site inventory for further investigation. Information does not need to be specific but, where known, can include key factors such as source and waste characteristics (e.g., drums, contaminated soil); evidence of release or potential release; threatened targets (e.g., drinking water wells); key sampling results (if available); CERCLA eligibility; involvement of other cleanup programs; and other supporting factors.

Insert text here:

An airborne release of hydrogen chloride and/or chlorine threatened nearby businesses, residences, and schools (including Benedictine College), requiring a significant number of evacuations, while others were advised to shelter in place. Approximately 100 people sought medical attention for respiratory distress as a result of the release, including five City employees. START used a MultiRAE Pro multi-gas detector (with oxygen, combustible gas, chlorine, volatile organic compound [VOC], and gamma radiation sensors) and MultiRAE Plus multi-gas detector that included a hydrogen sulfide sensor to acquire and record readings at 11 locations around the MGP facility. All readings were non-detect except for oxygen, which was 20.9% (normal) at all locations. Releases to groundwater, surface water, and surface soil were not likely because the release occurred into the air. Haz-Mat Response, Inc., under contract to MGP, transferred contents of the 6,500-gallon sodium hypochlorite tank to portable 2,000-gallon tanks that had been deployed to the site. The incident involved a single (i.e., not ongoing) occurrence of an airborne release of hazardou

Site Assessor: Jones, Brandon1 Digitally signed by Jones, Brandon1 DN: dc=local, dc=tt, ou=TSS, ou=EMI, ou=Users, cn=Jones, Brandon1 Date: 2017.04.04 16:09:30 -05'00' 04/04/2017

Print Name/Signature Date

EPA Regional Review and Pre-CERCLA Screening Decision

Add site to the Superfund active site inventory for completion of a:

- ☐ Standard/full preliminary assessment (PA)
- ☐ Abbreviated preliminary assessment (APA)
- ☐ Combined preliminary assessment/site inspection (PA/SI)
- ☐ Integrated removal assessment and preliminary assessment
- ☐ Integrated removal assessment and combined PA/SI
- ☐ Other: _____

Do not add site to the Superfund active site inventory. Site is:

- ☒ Not a valid site or incident
- ☐ Being addressed by EPA's removal program
- ☐ Being addressed by a state cleanup program
- ☐ Being addressed by a tribal cleanup program
- ☐ Being addressed under the Resource Conservation and Recovery Act
- ☐ Being addressed by the Nuclear Regulatory Commission
- ☐ Other: _____

EPA Regional Reviewer: _____ _____

Print Name/Signature Date